

Remarks/Arguments:

Claims 1-35 are pending and stand rejected.

By this Amendment claims 1, 5-22 and 26-28 are amended. Support for the claim amendments can be found throughout the specification and, in particular, in the paragraph spanning pages 31 and 32.

Entry and approval of the Amendment is respectfully requested.

Rejection of Claims 1, 3 and 20 Under 35 U.S.C. §103(a)

In the Action, claims 1, 3 and 20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Iyer et al. (U.S. Patent Publication No. 2004/0203749) (hereinafter referred to as Iyer) in view of Flykt (WO 0141395).

Reconsideration is respectfully requested.

Claim 1

Claim 1 is directed to a method of managing mobility of a mobile terminal on at least one domain network, and recites "responsive to the mobile terminal moving to another subnet of the plurality of subnets for a threshold period, changing the main home agent apparatus to another one of the home agent apparatus." That is, the changing of the main home agent apparatus to another home agent apparatus is responsive to a triggering condition (i.e., the mobile terminal moving to another subnet for a threshold period).

Iyer Reference

Iyer discloses a home agent selection portion 108a which provides home agent selection procedures. These procedures may be based on route optimization criteria 108a1, load balancing criteria 108a2, random criteria 108a3 or other criteria. For example, an optimal home agent may be selected based on the current location of the mobile device 20b or based on a home agent that is lightly loaded compared to another home agent or a random process rather than a deterministic process. (See Iyer at paragraph [0021].) Moreover, Iyer et al. discloses the use of service location protocol (SLP), a framework to discover the existence, location, and configuration of networked services, for triggering automatic home agent and home address discovery. (See Iyer at paragraph [0031].) Iyer, however, is silent regarding a change to a home agent apparatus responsive to a triggering condition (i.e., the mobile terminal moving to

another subnet of the plurality of subnets for a threshold period). That is, Iyer does not disclose or suggest anything related to a triggering condition based on a threshold period for the mobile terminal on a subnet.

Flykt Reference

The addition of Flykt does not overcome the deficiencies of Iyer because Flykt is silent regarding any triggering condition for changing the home agent apparatus. Thus, Flykt does not disclose or suggest anything related to a triggering condition based on a threshold period for the mobile terminal on a subnet.

The cited art of Iyer and Flykt taken singularly or in any proper combination does not disclose or suggest the feature of changing the home agent apparatus responsive to a triggering condition (i.e., the mobile terminal moving to another subnet of the plurality of subnets for a threshold period) as required by claim 1. Accordingly, applicants request that the rejection of claim 1 be withdrawn.

Claim 20

Claim 20, although not identical to that of claim 1, includes similar patentable features to those of claim 1. Accordingly, applicants request that the rejection of claim 20 also be withdrawn for reasons similar to those of claim 1.

Claim 3

Claim 3 includes all the limitations of claim 1 from which it depends, and applicants request that the rejection of this claim also be withdrawn for at least the same reasons as those of claim 1.

Rejection of Claims 2, 5-13 and 21-28 Under 35 U.S.C. §103(a)

In the Action, claims 2, 5-13 and 21-28 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Iyer and Flykt in further view of Wenzel et al. (U.S. Patent Publication No. 2003/0073439) (hereinafter referred to as Wenzel). It appears from the body of the rejection, that the Examiner incorrectly included claims 14-19 in this rejection. Accordingly, these claims will be address below with respect to the rejection which includes Heller et al. (U.S. Patent Publication No. 2002/0147837.) (hereinafter referred to as Heller).

Reconsideration is respectfully requested.

Claims 2, 5-19 and 21-28, that include all the limitations of claim 1 or claim 20 from which they ultimately depend, are submitted to be patentable over the combination of Iyer and Flykt for the same reasons as those set forth for claim 1 or claim 20.

The addition of Wenzel does not overcome the deficiencies of Iyer and Flykt because Wenzel is silent regarding changing the home agent apparatus responsive to a triggering condition (i.e., the mobile terminal moving to another subnet of the plurality of subnets for a threshold period) as required by claim 1 or claim 20. More particularly, Wenzel discloses primary and secondary home agents such that when the registration of the primary home agent fails the secondary home agent is registered. (See Wenzel at paragraph [0030].) Thus, Wenzel, which discloses a registration failure as a triggering condition, otherwise, does not disclose or suggest a triggering condition based on a threshold period for the mobile terminal on a subnet.

The cited art of Iyer, Flykt and Wenzel taken singularly or in any proper combination does not disclose or suggest the feature of changing the home agent apparatus responsive to a triggering condition (i.e., the mobile terminal moving to another subnet of the plurality of subnets for a threshold period) as required by claim 1 or claim 20.

Accordingly, applicants request that the rejection of claims 2, 5-13 and 21-28, which depend from claim 1 or claim 20 be withdrawn for at least the same reasons as those of claim 1 or claim 20.

Rejection of Claims 14-19 and 29-34 Under 35 U.S.C. §103(a)

In the Action, claims 14-19 and 29-34 are rejected under 35 U.S.C. §103(a) as being unpatentable over the combination of Iyer, Flykt and Wenzel and in further view of Heller.

Reconsideration is respectfully requested.

Claims 14-19 and 29-34, that include all the limitations of claim 1 or claim 20 from which they ultimately depend, are submitted to be patentable over the combination of Iyer, Flykt and Wenzel for the same reasons as those set forth for claim 1 or claim 20.

The addition of Heller does not overcome the deficiencies of Iyer, Flykt and Wenzel because Heller, similar to Flykt, is silent regarding changing the home agent apparatus responsive to any triggering condition and, in particular, such a triggering condition of the mobile terminal moving to another subnet for a threshold period.

The cited art of Iyer, Flykt, Wenzel and Heller taken singularly or in any proper combination does not disclose or suggest the feature of changing the home agent apparatus responsive to a triggering condition (i.e., the mobile terminal moving to another subnet of the plurality of subnets for a threshold period) as required by claim 1 or claim 20.

Accordingly, applicants request that the rejection of claims 14-19 and 29-34, which depend from claim 1 or claim 20, be withdrawn for at least the same reasons as those set forth for claim 1 or claim 20.

Conclusion

In view of the claim amendments and remarks set forth above, applicants request that the Examiner reconsider and withdraw the rejection of claims 1-20.

Respectfully submitted,

RatnerPrestia

Lawrence E. Ashery, Reg. No. 34,515
Eric Berkowitz, Reg. No. 44,030
Attorneys for Applicants

EB/ds/mjc/bj

Dated: April 25, 2006

P.O. Box 980
Valley Forge, PA 19482
(610) 407-0700

The Commissioner for Patents is hereby authorized to charge payment to Deposit Account No. 18-0350 of any fees associated with this communication.

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:
April 25, 2006

Beth Johnson

BETHJ_1:\MAT\8574US\AMEND_02.DOC